

UNITED STATES DISTRICT COURT OF THE
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: ASBESTOS PRODUCTS	:	
LIABILITY LITIGATION (No. VI)	:	:Consolidated Under
-----	:	MDL DOCKET NO. 875
	:	
MICHAEL CURRY,	:	:EDPA Civil Action No.
	:	09-CV-65685
v.	:	
	:	Transferor District Court
AMERICAN STANDARD, INC., et al,	:	Southern District of New York
	:	SDNY Civil Action No.
	:	08-CV-10228
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**DEFENDANTS FOSTER WHEELER ENERGY CORPORATION AND
GENERAL ELECTRIC COMPANY'S NOTICE OF DEPOSITION OF
ARNOLD P. MOORE, PE**

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 30 (B)(1), the deposition upon oral examination of Plaintiff's expert witness, Arnold P. Moore, PE, whose address is 395 Canterbury Lake, Alpharetta, GA 30004, will be taken on a date and time to be agreed by the parties at the office of Sedgwick, Detert, Moran & Arnold, LLP, attorneys for Defendants Foster Wheeler Energy Corporation and General Electric Company, located at Three Gateway Center, 12th Floor, Newark, New Jersey 07102.

Plaintiff's expert Arnold P. Moore, PE is hereby required to produce at that examination the following items:

1. A current curriculum vitae detailing his background training and education.
2. All articles, pamphlets, parts of books or books written by him or to which he contributed, whether published or unpublished, which relate to the subject matter of this litigation.
3. All materials and documents of any kind that he has received concerning this case.

4. All documents, including but not limited to notes, reports, records or any other written materials, dictated or otherwise recorded by him or at his direction relating to the examination of plaintiff, inspection of all work sites, inspection of all fibers and/or the preparation of any "reports" served in this case.

5. Any documents, including but not limited to notes, records, reports or other written materials dictated or otherwise recorded which are in his possession and relate to his proposed testimony in this case.

6. Any documents, including but not limited to notes, records, correspondence and other materials relating in any way to any examination of plaintiff, or conversation(s) with any other person regarding this case or his review of any material relating to this case.

7. A detailed list and description of all books, records, translations, articles, writings, publications, correspondence, notes or documents or any other material upon which he bases his opinion and specifically rely or refer to in his testimony in this action.

8. Copies of all unpublished items detailed in the list and description required by the immediately preceding paragraph.

9. All written reports prepared by him in connection with this case.

10. All writings or other tangible evidence that he has in his possession or at his disposal concerning conversations had by him with anyone, including attorneys, and on which he plans to rely on in any way whatsoever in giving his testimony in this case.

11. All written correspondence that he has sent to or received from any person, party or entity concerning this litigation.

12. His complete file regarding this matter.

13. Any photographs, sketches, drawings or videotapes which relate in any way to his testimony in this matter.

Defendants reserve the right to question any witness produced by Plaintiffs to the full extent permitted by Federal Rule of Civil Procedure 26 (B) (1).

This deposition will be taken on oral examination before a Notary Public and certified Court Reporter.

Dated: Newark, New Jersey
November 11, 2009

SEDGWICK, DETERT, MORAN & ARNOLD, LLP

By: Robert M. Gilmartin, Jr.
Robert M. Gilmartin, Jr., Esq.
Attorneys for Defendants
Foster Wheeler Energy Corporation and
General Electric Company
Three Gateway Center, 12th Floor
Newark, New Jersey 07102
(973) 242-0002

To: Robert Komitor, Esq.
Sharon J. Zinns, Esq.
Attorneys for Plaintiffs
Levy Phillips & Konisberg, LLP
800 Third Avenue
New York, New York 10022

Counsel for All Defendants

AFFIDAVIT OF SERVICE

STATE OF NEW JERSEY)
 : SS.:
COUNTY OF ESSEX)

Dorothy Tam, being duly sworn, deposes and says: that deponent is not a party to the action, is over 18 years of age and resides in the State of New York, Kings County.

That on the **16th day of November 2009** deponent served within *Foster Wheeler, L.L.C. and General Electric Company's Notice of Deposition of Arnold P. Moore, PE [Re: Michael Curry]* by **First Class mail & Fascimile** to:

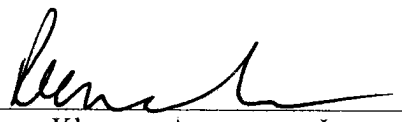
**Robert Komitor, Esq.
Sharon Zinns, Esq.
Levy Phillips & Konisberg
800 Third Avenue**

and a copy of same upon **all known remaining defense counsel of record** on the attached rider by **first class mail & fascimil e** at the addresses designated by said attorneys and to for the purpose of depositing a true copy of same via First Class through the United States Postal Service, Newark, New Jersey 07102



Dorothy Tam

Sworn and subscribed to before
me this **16th day of November 2009**



Reena Khanna, Attorney at Law
State of New Jersey

Michael Curry Service Rider

Robert Malaby, Esq. Malaby & Bradley, LLC 150 Broadway New York, New York 10038	Counsel for Viacom, Inc. and Warren Pumps, Inc.
John A. Turlik, Esq. Dave Weinberg, Esq. Segal McCambridge, Singer & Mahoney 830 Third Avenue, Suite 400 New York, New York 10022-7523	Counsel for Anchor Packing Co., Fairbanks Morse Engine, Fairbanks Morse Pump Corp. and Garlock Sealing Technologies, LLC
Scott R. Emery, Esq. Lynch Daskal Emery LLP 264 West 40th Street New York, New York 10018	Counsel for Georgia Pacific Corporation
Frank Cecere, Esq. Ahmuty Demers & McManus 200 I.U. Willets Road Albertson, NY 11507	Counsel for Carrier Corp.
Joseph Colao, Esq. Leader & Berkon 630 Third Avenue, 17th Floor New York, NY 10017	Counsel for IMO Industries, Inc.
Julie Evans, Esq. Wilson Elser Moskowitz Edelman & Dicker LLP 150 East 42 nd Street New York, New York 10017	Counsel for A.W. Chesterton Co, Inc.
Lawrence McGivney, Esq. McGivney, Kluger & Gannon, P.C. 80 Broad Street – 23rd Fl. New York, New York 10004	Counsel for Leslie Controls, Inc.
Yvette Harmon, Esq. McGuire Woods, LLP 1345 Avenue of the Americas, 7th Floor New York, New York 10105	Counsel for American Standard, Inc.
Michael Waller, Esq. Kirkpatrick, Lochard, Nicholson & Graham LLP One Newark Center, 10th Floor Newark, New Jersey 07102	Counsel for Crane Co. and Crane Pumps & Systems, Inc.
William Mueller, Esq. Clemente, Dickson & Mueller 218 Ridgedale Avenue Morristown, New Jersey 07961	Counsel for Durabla Manufacturing Company
Lisa Pascarella, Esq. Pehlivanian Braaten & Pascarella, LLC 2430 Route 34 Manasquan, New Jersey 08736	Counsel for Ingersoll-Rand Co.
Linda Yassky, Esq. Sonnenschein Nath & Rosenthal 1221 Avenue of the Americas New York, New York 10020	Counsel for Rapid American Corporation
Edward Wilbraham, Esq. Wilbraham Lawler & Buba 140 Broadway, 46th Floor New York, NY 10005	Counsel for Buffalo Pumps, Inc.

Andrew Czerepak, Esq. Consolidated Edison Four Irving Place New York, New York 10003	Counsel for Consolidated Edison Company of New York, Inc.
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